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22 UNITED STATES DISTRICT COURT
23 FOR THE CENTRAL DISTRICT OF CALIFORNIA

24 UNITED STATES OF AMERICA,
25 Plaintiff,

26 v.

27 THE STATE OF CALIFORNIA;
28 GAVIN C. NEWSOM, in his Official
Capacity as Governor of California;
KAREN ROSS, in her Official Capacity
as Secretary of the California
Department of Food & Agriculture;
ERICA PAN, in her Official Capacity as
Director of the California Department of
Public Health; and ROB BONTA, in his
Official Capacity as Attorney General of
California,

Defendants.

Case No. 2:25-cv-06230-MCS-AGR

**DECLARATION OF GENE BAUR
IN SUPPORT OF PROPOSED
DEFENDANT-INTERVENORS'
UNOPPOSED MOTION TO
INTERVENE**

The Honorable Mark C. Scarsi

Date: August 25, 2025

Time: 9:00 a.m.

Location: First Street Courthouse, 350
W. 1st Street, Courtroom 7C, 7th
Floor, Los Angeles, California 90012

Trial Date: None

Action Filed: July 9, 2025

**DECLARATION OF GENE BAUR IN SUPPORT OF PROPOSED
DEFENDANT-INTERVENORS' UNOPPOSED MOTION TO INTERVENE**

I, Gene Baur, declare as follows:

1. I am President and Co-Founder of Farm Sanctuary, Inc. ("Farm Sanctuary") and I have held a leadership position with Farm Sanctuary since I co-founded the organization in 1986.

2. I am authorized to make the following statements on behalf of Farm Sanctuary, which are also based on my personal knowledge. If called to testify, I would testify competently under oath to the facts stated in this declaration.

3. Farm Sanctuary is a national non-profit 501(c)(3) farm animal-advocacy organization organized pursuant to the laws of the state of Delaware, with its principal place of business in Watkins Glen, New York. Farm Sanctuary has over one million constituents nationwide, including over 80,000 constituents in California.

4. Farm Sanctuary is the founding farm animal rescue and protection organization in the United States. Core to its mission is protecting farm animals from cruelty and encouraging public awareness about farm animal issues through education and media outreach. Farm Sanctuary advocates against inhumane practices used to raise animals for food.

5. Beginning with the first successful ballot measure in the U.S. to limit the inhumane confinement of farm animals, Farm Sanctuary has committed resources to similar efforts, including California's Proposition 12. In addition to gathering signatures to qualify Proposition 12 for the ballot and urging our supporters to help gather signatures, Farm Sanctuary committed human and financial resources to producing videos encouraging voters to support Proposition 12, which we promoted across Farm Sanctuary's social media platforms. Farm Sanctuary also committed resources to educating our constituents and members of the public about Proposition 12 through e-mail communications and social media

1 posts encouraging support of Proposition 12. Farm Sanctuary has also been a
2 Defendant-Intervenor in other active federal court challenges to Proposition 12, one
3 of which was eventually decided by the Supreme Court,¹ and has participated in the
4 state regulatory process by submitting comments.

5 6. If Proposition 12 is struck down, Farm Sanctuary's efforts would be
6 undermined and more of its resources would need to be expended elsewhere to
7 promote other measures to protect farm animals.

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing
9 is true and correct, based on my own personal knowledge, and as to those matters, I
10 believe them to be true.

11 Executed this 23rd day of July, 2025, in Arlington, Virginia.

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Gene Baur

¹ *North Am. Meat Inst. v. Becerra*, No. 2:19-cv-08569 (C.D. Cal. Oct. 4, 2019);
Iowa Pork Producers Ass'n v. Bonta, No. 2:21-CV-09940 (C.D. Cal. Dec. 16,
2021); *Nat'l Pork Producers Council v. Ross*, Case No. 3:19-cv-02324 (S.D. Cal.
Dec. 5, 2019) (lower court decision in favor of Defendants affirmed in *Nat'l Pork
Producers Council v. Ross*, 598 U.S. 356 (2023)).